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July 23, 2025

Via ECF

Magistrate Judge Victoria Reznik
United States District Court for the Southern District of New York
300 Quarropas Street, Courtroom 420
White Plains, NY 10601-4150

Re: **The Wave Studio, LLC v. General Hotel Management, Ltd., et al.**
Civil Action No: 7:13-cv-09239-CS

Dear Judge Reznik:

This firm represents General Hotel Management, Ltd. ("GHM") in connection with the above-referenced matter. We write regarding Plaintiff's request to formally terminate GHM from the docket in its June 18, 2025 letter (Doc. No. 528), with which request GHM agrees. As set forth in Plaintiff's letter, there are currently no pending claims against GHM by any parties in the case or any cases consolidated therewith (whether claims by Plaintiff or any co-Defendants), and, for the reasons set forth in Plaintiff's request and below, GHM respectfully submits that it would be appropriate for its participation in this case to be formally terminated.

Specifically, all of Plaintiff's claims against GHM were dismissed at summary judgment on March 10, 2017 (Doc. No. 209), which decision was upheld on appeal on February 26, 2018. Summary Order, Wave Studio, LLC v. General Hotel Management, Ltd., No. 17-1018 (2d Cir. Feb. 26, 2018), Doc. No. 88. After that, GHM's continued involvement in the case, once it reopened in 2023, was based entirely on a lingering cross-claim filed against GHM (and all other co-Defendants in the case at that time) in 2014 by a single co-Defendant, Delta Airlines ("Delta") (Doc. No. 75); which, according to Delta, was mistakenly filed as the Court had, prior to the filing of Delta's Answer, stayed the action as to all co-Defendants except GHM (Doc. No. 67). In fact, Delta attempted to withdraw its Answer and cross-claim shortly thereafter (Doc. No. 78), on which request the Court or the Clerk did not ultimately rule. Plaintiff dismissed Delta Airlines from the case on April 29, 2025 (Doc. No. 472). As such, Delta's cross-claim against GHM and the other co-Defendants has also been dismissed, and there are no longer any claims against GHM in any capacity.

Accordingly, GHM respectfully joins Plaintiff's request that it be formally terminated from the docket. Should the Court require any further information in connection with Plaintiff's request, to which GHM consents, please do not hesitate to contact the undersigned.

We thank the Court for its attention to this matter.

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Respectfully submitted,

/Abigail J. Remore/

Abigail J. Remore

AJR:sd

cc: All counsel of record via ECF

Plaintiff's request to formally terminate Defendant General Hotel Management, Ltd. (GHM) from the docket (ECF No. 528) is **GRANTED**. GHM has been dismissed from the case, and there are no claims currently pending against it. Although other defendants have suggested the possibility of future cross-claims for indemnification, no such claims have been filed. Thus, GHM shall be terminated from the docket as a party to this action (including any related and consolidated cases). If any defendant later seeks to assert a third-party claim against GHM, they may seek to do so in accordance with the Court's individual practices and Rule 14 of the Federal Rules of Civil Procedure. The Clerk is respectfully directed to terminate defendant General Hotel Management, Ltd. from the docket.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Victoria Reznik', is written over a horizontal line.

Hon. Victoria Reznik, U.S.M.J.

Dated: 7/25/2025